



10/20/2020
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 11/10/2020
New York, New York 10018
T (212) 218-5500
F (212) 218-5526
ssverdlov@seyfarth.com
T (212) 218-5547
www.seyfarth.com

November 9, 2020

VIA ECF & E-MAIL

Hon. Andrew L. Carter, Jr.
U.S. District Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Courtroom 1306
New York, NY 10007
ALCarterNYSDChambers@nysd.uscourts.gov

MEMO ENDORSED

Re: Swartz v. 50 Bowery Holdings LLC,
Civil Action No.: 1:20-cv-08613 (S.D.N.Y.)

Dear Judge Carter:

This office represents Defendant 50 Bowery Holdings LLC ("Defendant") in the above-referenced matter. We write, with the consent of Plaintiff Helen Swartz ("Plaintiff"), to respectfully request a 30-day extension of the deadline for Defendant to respond to the Complaint, up to and including December 21, 2020.

By way of background, Plaintiff commenced this action on or about October 15, 2020. (ECF No. 1.) Defendant was served with the Summons and Complaint on October 30, 2020. Defendant's responsive pleading is due on or before November 20, 2020.

This is the first request for an extension of Defendant's responsive pleading deadline. Defendant is requesting this extension to provide it with additional time to investigate the allegations in the Complaint. We have communicated with counsel for Plaintiff, and Plaintiff consents to this request.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this application will not impact any other scheduled deadlines. We thank the Court for its time and attention to this matter.



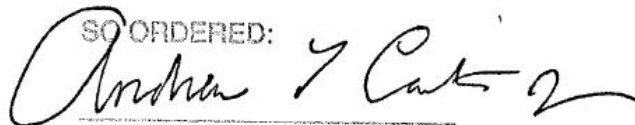
Hon. Andrew L. Carter, Jr.
November 9, 2020
Page 2

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Samuel Sverdlov

Samuel Sverdlov

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE
Dated: November 10, 2020